R M Environmental, Inc.

Geology - Environmental - Geotechnical Engineering

June 20, 2012
Project No. 10-629

Mr. Peter A Garcia, REA II
Director, Site Assessment Strategies
The Planning Group
2850 Inland Bank Blvd., Suite B
Ontario, CA. 91764

SUBJECT: Clarification of Environmental Issues
Proposed Phase 1 of Uptown Newport Village Project
Newport Beach, California

Dear Mr. Garcia:

The following is provided for clarification of the items we discussed today.

1) Oversight regulatory agency for soil and groundwater contamination.

   The lead oversight agency for this site is the California Regional Water Quality Control Board – Santa Ana Region (CRWQCB). The CRWQCB will provide a "No Further Action" (N FA) declaration or allowance for residential construction for the Phase 1 portion of the site. The Phase 2 portion of the site will be developed following additional remedial work and the findings of a Human Health Risk Assessment (HHRA) as approved by the CRWQCB.

2) Locations of Soil Gas Probes Used in the Vapor Intrusion Health Risk Assessment for Uptown Newport Village-Phase One-Newport Beach, California (Skinner Associates, February 13, 2012).

   Potential sources of contamination of the Phase 1 portion of the site have been identified to be limited to the migration of volatile organic compounds (VOCs) in soil gas and groundwater from the former UST areas in the Phase 2 portion of the site. The soil gas probes used in the above Health Risk Assessment were located between the source areas in the Phase 2 portion of the site and the perimeter of the Phase 1 property. The findings of the soil gas probes in the Phase 2 portion of the site indicated acceptable health risk levels; therefore indicating an acceptable health risk for the Phase 1 portion of the site.

3) Potential for Future Groundwater VOC Migration in the Phase 1 portion of the site.

Prior to 1991, the apparent direction of groundwater flow of the upper aquifer beneath the site was to the southeast. Since 1991, the apparent direction of groundwater of the upper aquifer has been toward a residual groundwater depression area between existing buildings 501 and 503 (Phase 2 area of site). In general, the areas of concern (> 100 ppb total VOCs) of the upper aquifer have remained in the general vicinities of the former source areas (former USTs).

The detected VOC concentrations in the upper groundwater zone continue to decrease. As part of the conditions for the allowance of development of Phase 1, the CRWQCB will require continued monitoring and sampling of selected wells in the Phase 1 portion of the site. Additional groundwater remediation is scheduled for the Phase 2 portion of the site within the next 1 to 2 years. In the unlikely event that additional VOC migration were to occur from the Phase 2 area into the Phase 1 portion of the site, in-situ groundwater mitigation could effectively be conducted. It is our opinion, the potential of future adverse (> 100 ppb total VOCs) groundwater migration from the Phase 2 portion of the site into the Phase 1 property is very low.

If you have any questions or need additional information, please contact us at (909)446-0041.

Sincerely,

Robert C. Manning, CEG/RCE
Project Manager